

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN SECTION OF TENNESSEE
WESTERN DIVISION

SCOTT TURNAGE , CORTEZ D. BROWN,
DEONTAE TATE, JEREMY S. MELTON,
ISSACCA POWELL, KEITH BURGESS,
TRAVIS BOYD, TERRENCE DRAIN and
KIMBERLY ALLEN on behalf of themselves
and all similarly situated persons,

PLAINTIFFS,

v.

BILL OLDHAM, in his individual capacity as
former Sheriff of Shelby County, Tennessee;
FLOYD BONNER, JR. in his official capacity
as the Sheriff of Shelby County, Tennessee;
ROBERT MOORE, in his individual capacity as
former Jail Director of Shelby County,
Tennessee; KIRK FIELDS, in his official
capacity as the Jail Director of Shelby County,
Tennessee; CHARLENE MCGHEE, in her
individual capacity as former Assistant Chief of
Jail Security of Shelby County, Tennessee;
REGINALD HUBBARD, in his official capacity
as Assistant Chief of Jail Security Chief of Jail
Security of Shelby County, Tennessee;
DEBRA HAMMONS, in her individual capacity
as former Assistant Chief of Jail Programs;
TIFFANY WARD in her official capacity as the
Assistant Chief of Jail Programs of Shelby
County, Tennessee; SHELBY COUNTY,
TENNESSEE, a Tennessee municipality;
TYLER TECHNOLOGIES, INC., a foreign
corporation; GLOBAL TEL*LINK
CORPORATION, a foreign corporation;
SOFTWARE AG USA, INC., a foreign
corporation; and SIERRA-CEDAR, INC., a
foreign corporation,

DEFENDANTS.

Case No. 2:16-cv-2907-SHM/tmp

(Hon. Judge Samuel H. Mays)

**CLASS ACTION COMPLAINT FOR
VIOLATIONS OF THE CIVIL RIGHTS ACT
OF 1871, 42 U.S.C. § 1983, AND TENNESSEE
COMMON LAW**

**JURY TRIAL DEMANDED
PURSUANT TO FED. R. CIV. PRO. 38(a) &
(b)**

**UPDATE REGARDING ORDER GOVERNING PRODUCTION OF COURT RECORDS
AND ELECTRONICALLY STORED INFORMATION**

United States Magistrate Judge Tu M. Pham entered the Order Governing Production of Court Records and Electronically Stored Information (“Order”) on March 19, 2019. (D.E. 180) The Court entered the Order after the Shelby County Defendants¹ and the Plaintiffs agreed to a timeline for production of court records and electronically stored information.

Pursuant to the Court’s Order, the Shelby County Defendants would scan and produce the Criminal Court Jackets no later than Monday, April 15, 2019. After starting the scanning process, the Shelby County Defendants concluded they need additional time to complete the scanning process and production of Criminal Court Jackets to the Plaintiffs.

The Order states if the Shelby County Defendants need additional time, the parties “shall confer to determine a reasonable extension of time for the production and communicate their agreement to the Court.” (D.E. 180, ¶3) Counsel for the Shelby County Defendants’ consulted with Plaintiffs’ counsel on April 10, 2019 regarding an extension of time. The Shelby County Defendants and Plaintiffs agreed to extend the deadline to Friday, April 26, 2019 for the Shelby County Defendants to complete the scanning and production of the Criminal Court Jackets to the Plaintiffs.

The Shelby County Defendants respectfully requests the Court extend the April 15, 2019 deadline for scanning and production of the Criminal Court Jackets to the Plaintiffs to Friday, April 26, 2019.

¹ The “Shelby County Defendants” include Shelby County, Tennessee, and the following individuals named in their individual and/or official capacities: Bill Oldham, Floyd Bonner, Jr., Robert Moore, Kirk Fields, Charlene McGhee, Reginald Hubbard, Debra Hammons, and Tiffany Ward.

Respectfully submitted,

/s/ Odell Horton, Jr.

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CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(1)(B), the undersigned counsel for the Shelby County Defendants, consulted by telephone and/or e-mail with counsel for the Plaintiffs, Frank Watson and Michael G. McLaren regarding this extension of time on April 10, 2019. They indicated that they consent to the extension of time.

/s/ Odell Horton, Jr.

CERTIFICATE OF SERVICE

I certify that the foregoing is being filed via the Court's ECF system this 12th day of April, 2019, for service on all persons registered in connection with this case, including:

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